

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

THE STATE OF TEXAS, et al.,	§	
	§	
Plaintiffs,	§	
v.	§	Civil Action No. 4:20-cv-00957-SDJ
	§	
GOOGLE LLC,	§	Hon. Sean D. Jordan
	§	Special Master: David T. Moran
Defendant.	§	

**GOOGLE LLC’S UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL**

Defendant Google LLC (“Google”) respectfully moves the Court for leave to file under seal its Opening Brief to the Special Master for the March 7, 2024 Hearing (“Brief”) and Exhibits 1, 2, and 3 thereto (“Exhibits”). Consistent with Local Rule CV-5, Google will file redacted versions of its Brief and Exhibits within seven days. Plaintiffs do not oppose Google’s sealing request.

Google’s exhibits have been deemed by Plaintiffs to be “Confidential” and “Highly Confidential” pursuant to the Confidentiality Order in this case, ECF No. 182, and in the parallel litigation pending in the Southern District of New York and the Eastern District of Virginia. And, Google’s Brief makes references to portions of these exhibits.

While “the public has a common law right to inspect and copy judicial records,” courts “must balance the public’s common law right of access against the interests favoring nondisclosure.” *S.E.C. v. Van Waeyenberghe*, 990 F.2d 845, 848 (5th Cir. 1993) (citations omitted). Good cause exists here to allow sealing, where the materials that Google requests to be sealed contain references to and discussion of information Plaintiffs have deemed as

“Confidential” and “Highly Confidential” pursuant to Court-ordered protective and confidentiality orders. *See* Local Rule CV-5(a)(7)(E).

Therefore, Google respectfully requests that the Court grant Google leave to file its Brief and Exhibits 1, 2, and 3 thereto under seal.

Dated: February 27, 2024

Respectfully submitted,

/s/ R. Paul Yetter

R. Paul Yetter

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**CERTIFICATE OF SERVICE**

I certify that on February 27, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ R. Paul Yetter

R. Paul Yetter

**CERTIFICATE OF CONFERENCE**

I hereby certify that the meet and confer requirements in Local Rule CV-7(h) have been met. This motion is consented to and not opposed by any party.

/s/ R. Paul Yetter

R. Paul Yetter